

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and
IME MANAGEMENT & CONSULTING LLC,

Defendants.

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Case No.: 1:22-cv-1032 (PKC) (JRC)

**REPLY DECLARATION OF JAMIE S.
FELSEN, ESQ. IN FURTHER SUPPORT
OF PLAINTIFF’S MOTION FOR A
PRELIMINARY INJUNCTION AND
TRO**

I, Jamie S. Felsen, Esq., pursuant to 28 U. S.C. § 1746, declare as follows:

1. I am a member of the law firm Milman Labuda Law Group PLLC (“MLLG”), counsel for IME WatchDog, Inc. (hereinafter “Plaintiff”) in the above-referenced case.
2. I submit this declaration in support of Plaintiff’s motion for a preliminary injunction and temporary restraining order.
3. Annexed hereto as Exhibit A is a copy of a response I received on June 26, 2024 in response to a subpoena I caused to be served on GoDaddy.com, LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2024.

MILMAN LABUDA LAW GROUP PLLC

/s/Jamie S. Felsen
Jamie S. Felsen, Esq.